

APR 16 2024

: Clerk, US District Court
Western District NC

UNITED STATES OF AMERICA)	DOCKET NO. 5:24-cr-10-KDB
)	
v.)	BILL OF INDICTMENT
)	
MADISON DARE WINSLOW)	Violations: 21 U.S.C. § 841(a)(1)
)	
)	
)	

THE GRAND JURY CHARGES:

COUNT ONE

(Distribution of Fentanyl Resulting in Death)

On or about February 14, 2022, in Catawba County, within the Western District of North Carolina, the defendant,

MADISON DARE WINSLOW,

did knowingly and intentionally distribute a controlled substance, that is, a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, and death resulted from the use of the fentanyl by J.M., in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWO

(Possession with Intent to Distribute Fentanyl)

On or about April 4, 2022, in Catawba County, within the Western District of North Carolina, the defendant,

MADISON DARE WINSLOW,

did knowingly and intentionally possess with the intent to distribute a controlled substance, that is, a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of 21 U.S.C. § 853. The following property is subject to forfeiture in accordance with Sections 853:

- a. All property which constitutes or is derived from proceeds of the violations set forth in this Bill of Indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations;
- c. If, as set forth in 21 U.S.C. § 853(p), any property described in (a) or (b) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant to the extent of the value of the property described in (a) or (b).

A TRUE BILL:

[REDACTED]
FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY


NICK J. MILLER
ASSISTANT UNITED STATES ATTORNEY